

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PATRICK MACHNIEWICZ, Individually and
on behalf of all others similarly situated,

Plaintiff,

v.

UXIN LIMITED, KUN DAI, ZHEN ZENG,
RONG LU, JULIAN CHENG, DOU SHEN,
HAINAN TAN, MORGAN STANLEY & CO.
INTERNATIONAL PLC, GOLDMAN SACHS
(ASIA) L.L.C., J.P. MORGAN SECURITIES
LLC, CHINA INTERNATIONAL CAPITAL
CORPORATION HONG KONG SECURITIES
LIMITED, and CHINA RENAISSANCE
SECURITIES (HONG KONG) LIMITED,

Defendants.

Case No: 1:19-cv-0822-MKB-VMS

CLASS ACTION

**NOTICE OF MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES,
AND AWARD TO PLAINTIFFS**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Granting Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No. 51), Plaintiffs' Counsel¹ respectfully moves this Court, before the Honorable Margo K. Brodie, United States District Judge of the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, 11201, on September 7, 2021 at 10:00 a.m., for entry of an order granting an award of attorneys' fees and expenses, and award to Plaintiffs.

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation of Settlement dated April 1, 2021 (the "Stipulation"). See ECF No. 46.

This motion is based on this Notice of Motion, the supporting Memorandum of Law, the Joint Declaration of Laurence Rosen and Michael Capeci and exhibits attached thereto, all filed contemporaneously herewith, all pleadings, records, and papers on file herein, and such further argument and briefing as may be presented at or before any hearing.

Defendants do not oppose this motion.

Dated: June 28, 2021

Respectfully submitted,

/s/ Laurence M. Rosen

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June, 2021, a true and correct copy of the foregoing **NOTICE OF MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES, AND AWARD TO PLAINTIFFS** was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence Rosen
Laurence Rosen